

# **EXHIBIT 65**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
-----X  
MARK I. SOKOLOW, et al.,  
  
PLAINTIFFS,  
  
-against- Case No.:  
04CV397 (GBD) (RLE)  
  
THE PALESTINE LIBERATION ORGANIZATION,  
et al.,  
  
DEFENDANTS.  
-----X

DATE: December 13, 2012  
TIME: 1:54 p.m.

EXAMINATION BEFORE TRIAL of the  
Plaintiff, ROBERT COULTER, SR.,, taken by  
the Defendant, pursuant to Notice and to the  
Federal Rules of Civil Procedure, held at  
the Offices of Morrison & Foerster,  
1290 Avenue of the Americas, New York,  
New York 10104, before Richard Aurelio,  
a Notary Public of the State of New York.

1 R. C O U L T E R, SR.

2 A. And I -- I can't prove that but  
3 that's what I heard.

4 Q. Did she die as a result of the  
5 wounds she received that day or --

6 A. I'm not sure of that.

7 Q. All right.

8 But as far as you're aware, your  
9 daughter was killed instantly and did not  
10 suffer?

11 A. That's correct.

12 Q. Are you aware of any evidence of  
13 the identity of the person or persons who  
14 was responsible for the bombing when Janis  
15 was killed?

16 A. I saw the names in the paper but I  
17 don't remember them.

18 Q. Apart from what you read in the  
19 newspaper, are you aware of any evidence as  
20 to the identity of the persons who are  
21 responsible for the death of your daughter?

22 A. No.

23 Q. I take it you've never spoken to  
24 anyone in Israel about this issue?

25 A. No.

1 R. C O U L T E R, SR.

2 Q. Have you spoken to any  
3 Palestinians about this issue?

4 A. No.

5 Q. At the time Janis was killed,  
6 was she working?

7 A. Yes.

8 Q. Where was she working?

9 A. She worked for the -- university  
10 in -- in New York office.

11 Q. Do you know what she was making at  
12 the time of her death?

13 A. I -- approximately -- I -- I don't  
14 know for sure. It was around 57,000.

15 Q. Are you making a claim in this  
16 lawsuit for income that Janis would have  
17 earned if she had lived?

18 A. That's correct.

19 Q. Do you know how such a claim can  
20 be quantified?

21 A. No.

22 Q. Have you made any attempt to  
23 figure out what Janis's earnings would have  
24 been had she not been killed --

25 A. No.

1 R. C O U L T E R, SR.

2 A. So, the only thing I got was when  
3 I read the article, she indicated that that  
4 was the flow of the money.

5 Q. Well, let me ask you this, sir,  
6 apart from what you read in the newspaper or  
7 what someone has told you, have you seen any  
8 other evidence that the PLO had something to  
9 do with Janis's death?

10 A. No.

11 Q. Let me ask you this, something  
12 called the Palestinian Authority, have you  
13 heard of that before?

14 A. Yes.

15 Q. Are you aware of any evidence that  
16 the Palestinian Authority had something to  
17 do with Janis's death?

18 A. I have no -- no idea.

19 Q. Sitting here today, you can't tell  
20 me of any --

21 A. No.

22 Q. -- such evidence?

23 A. No.

24 Q. You mentioned that you have a  
25 lawsuit against the Arab Bank and you have